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January, 27 2012

Ms. Jill Sugarman Reports Analysis Division Federal Election Commission 999 E Street, NW Washington, DC 20463

**IDENTIFICATION NUMBER: C00431171** 

REFERENCE: JULY QUARTERLY REPORT (04/01/2011-06/30/2011)

This statement is in response to the Commission's letter dated December 23, 2011. The Commission requested additional information on seven items.

First, the Commission requested that we address Column B discrepancies on the Detailed Summary Page for our July Quarterly Report. These discrepancies have been addressed and Amendments to the July Quarterly and the October Quarterly will be filed.

Second, the Commission requested clarification on contributions that appear to exceed federal limits. The individuals that appear to exceed the contribution limits do not. Any amount over the contribution limit of \$2,500 has been refunded or reattributed within 60 days. These refunds are either reflected in the October Quarterly or the Year End Report, or will be reflected in the February Monthly. The one contribution that was mistakenly reattributed on the 61st day will be refunded and subsequent reports will reflect this.

Third, the Commission requested clarification on donors who had mailing addresses outside the United States. Our Committee has safeguards in place to ensure that all contributions are made by eligible donors only.

Fourth, with respect to the non-federal committees listed, our Committee has safeguards in place to ensure these committees used permissible funds for their contributions.

Fifth, the Commission noted missing addresses on Line 23 disbursements. The addresses will be provided in an Amended Report.

Sixth, our disbursement to "Petty Cash" comports with the standards outlined in the Commission's letter.

Seventh, the Committee has reviewed all reimbursements to individuals for travel and subsistence and confirms that no further itemization is required under any Commission regulations for these expenditures.

This should answer the Commission's inquiry.

Sincerly,

Darrell Crate Treasurer